



MONTGOMERY McCRACKEN

ATTORNEYS AT LAW

Paul H. Zoubek
Admitted in New Jersey,
Pennsylvania & New York

LibertyView, Suite 600
457 Haddonfield Road
Cherry Hill, NJ 08002-2220

856-488-7700 *Main*
856-488-7731 *Direct*
856-488-7720 *Fax*
pzoubek@mmwr.com

June 9, 2015

Via Court's Electronic Filing System

Honorable Susan D. Wigenton, U.S.D.J.
United States District Court
M.L. King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: **United States v. Robert Stein**
Case: 2:12-cr-00140-SDW-1
Defendant's Request for Permission to Travel

Dear Judge Wigenton:

We represent Defendant Robert W. Stein in the above-referenced matter. On behalf of Mr. Stein, please accept this letter as a request to modify his Conditions of Release to permit him to travel to Canada from on or about July 12, 2015 through on or about July 19, 2015. The United States Department of Justice, Antitrust Division ("Antitrust Division") and Pretrial Services are aware of this request, have no objection and consent to the request. Accordingly, a proposed Consent Order is enclosed for Your Honor's consideration. Judge Hochberg and Judge Cavanaugh approved similar Consent Orders in 2012, 2013 and 2014 (copies enclosed).

On February 23, 2012, Mr. Stein pled guilty pursuant to the terms of a cooperating plea agreement with the Antitrust Division to violating the Sherman Act, 18 U.S.C. section 1. Mr. Stein was released on a \$100,000 unsecured appearance bond. Pursuant to the conditions of his release, Mr. Stein surrendered his passport and his travel was restricted to the Continental United States unless otherwise approved by Pretrial Services. Mr. Stein was also ordered to Pretrial Services supervision. Since the entry of his plea, Mr. Stein has reported consistently to Pretrial Services and he has continued to cooperate with the Antitrust Division.

Mr. Stein wishes to travel on vacation to Canada from on or about July 12, 2015 to on or about July 19, 2015. Pretrial Services has no objection to this request as long as Mr. Stein provides an itinerary to his Pretrial Services officer and makes arrangements to return his passport to Pretrial Services within 72 hours of his return to the United States. Bryan Bughman, Esquire, of the Antitrust Division, who is handling Mr. Stein's case, has no objection to this

MONTGOMERY McCRACKEN WALKER & RHOADS LLP
PENNSYLVANIA • NEW YORK • NEW JERSEY • DELAWARE

A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
LOUIS A. PETRONI, NEW JERSEY RESPONSIBLE PARTNER

Montgomery McCracken Walker & Rhoads LLP

Hon. Susan D. Wigenton, U.S.D.J.
June 9, 2015
Page 2

request, has reviewed the proposed form of Order and consents to the entry of an order granting Mr. Stein limited permission to travel outside the United States. Therefore, Mr. Stein respectfully requests that the Court enter the proposed Consent Order granting him limited permission to travel outside the United States for the time period and under the conditions set forth in the proposed Order.

Thank you for your consideration in this regard.

Very truly yours,

A handwritten signature in black ink, appearing to read 'P. H. Zoubek', with a long horizontal flourish extending to the right.

Paul H. Zoubek

PHZ:med

Enclosures

cc: Bryan C. Bughman, Esquire (*via* e-mail, w/encl.)
Jeff Paterson, Pretrial Services (*via* e-mail, w/encl.)
Lourdes Roscoe, Pretrial Services (w/encl.)

MONTGOMERY, McCracken, Walker & Rhoads, LLP
(A LIMITED LIABILITY PARTNERSHIP FORMED IN PENNSYLVANIA)

BY: Kristin Muir Mykulak, Esq.

457 Haddonfield Road, Suite 600

Cherry Hill, NJ 08002

Telephone: (856) 488-7700

Fax: (856) 488-7720

ATTORNEYS FOR DEFENDANT ROBERT STEIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT STEIN,

Defendant.

Case: 2:12-cr-00140

Hon. Faith S. Hochberg, U.S.D.J.

**CONSENT ORDER MODIFYING DEFENDANT ROBERT STEIN'S CONDITIONS
OF RELEASE TO PERMIT HIM TO TRAVEL OUTSIDE THE
CONTINENTAL UNITED STATES**

This matter having come before the Court upon the application of Kristin Muir Mykulak, Esquire, counsel for Defendant Robert Stein, for an Order Modifying Defendant's Conditions of Release to Permit Defendant to Travel Outside the Continental United States; and the United States Department of Justice, Antitrust Division and Pretrial Services having no objection and consenting to the request; and Defendant being in compliance with the conditions of his release;

IT IS on this 19th day of June 2014;

ORDERED that Defendant Robert Stein's Conditions of Release are modified to permit him to travel on vacation to Canada from on or about July 12, 2014 to on or about July 20, 2014

IT IS FURTHER ORDERED that Defendant provide an itinerary of his trip to his Pretrial Services officer prior to his departure; and

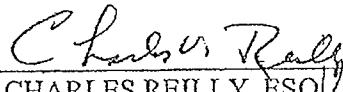
IT IS FURTHER ORDERED that Defendant make arrangements to return his passport to Pretrial Services within 72 hours of his return to the United States.

APPROVED AND SO ORDERED

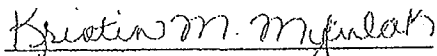


Honorable Faith S. Hochberg, U.S.D.J.

CONSENTED TO:

By: 
CHARLES REILLY, ESQ.
United States Department Of Justice
Antitrust Division
Jacob K. Javits Federal Building
Suite 3630
26 Federal Plaza
New York, NY 10278
Attorney for Plaintiff

Dated: June __, 2014

By: 
KRISTIN MUIR MYKULAK, ESQ.
Montgomery, McCracken, Walker
& Rhoads, LLP
LibertyView
457 Haddonfield Road, Suite 600
Cherry Hill, NJ 08002
Attorney for Defendant

Dated: June 17, 2014

MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP
(A LIMITED LIABILITY PARTNERSHIP FORMED IN PENNSYLVANIA)
BY: Paul H. Zoubek
457 HADDONFIELD ROAD, 6TH FLOOR
CHERRY HILL, NJ 08002
TELEPHONE: (856) 488-7700
FAX: (856) 488-7720
ATTORNEYS FOR DEFENDANT ROBERT STEIN

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT STEIN,

Defendant.

Case: 2:12-cr-00140

Hon. Dennis M. Cavanaugh, U.S.D.J.

**CONSENT ORDER MODIFYING DEFENDANT ROBERT STEIN'S CONDITIONS
OF RELEASE TO PERMIT HIM TO TRAVEL OUTSIDE THE
CONTINENTAL UNITED STATES**

This matter having come before the Court upon the application of Paul H. Zoubek, Esquire, counsel for Defendant Robert Stein, for an Order Modifying Defendant's Conditions of Release to Permit Defendant to Travel Outside the Continental United States; and the United States Department of Justice, Antitrust Division and Pretrial Services having no objection and consenting to the request; and Defendant being in compliance with the conditions of his release;

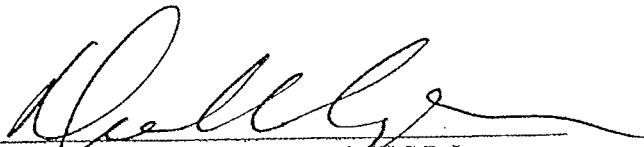
IT IS on this 16 day of June 2013;

ORDERED that Defendant Robert Stein's Conditions of Release are modified to permit him to travel on vacation to Canada from on or about July 15, 2013 to on or about July 21, 2013

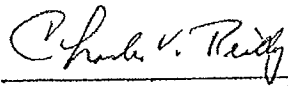
IT IS FURTHER ORDERED that Defendant provide an itinerary of his trip to his Pretrial Services officer prior to his departure; and

IT IS FURTHER ORDERED that Defendant make arrangements to return his passport to Pretrial Services within 72 hours of his return to the United States.


APPROVED AND SO ORDERED


Honorable Dennis M. Cavanaugh, U.S.D.J.

CONSENTED TO:

By: 
CHARLES REILLY, ESQUIRE
United States Department Of Justice
Antitrust Division
Jacob K. Javits Federal Building
Suite 3630
26 Federal Plaza
New York, NY 10278
Attorney for Plaintiff

Dated: June 4, 2013

By: 
PAUL H. ZOUBEK, ESQUIRE
Montgomery, McCracken, Walker
& Rhoads, LLP
LibertyView
457 Haddonfield Road, 6th Floor
Cherry Hill, NJ 08002
Attorney for Defendant

Dated: June 3, 2013

Case 2:12-cr-00140-DMC Document 11 Filed 06/28/12 Page 1 of 2 PageID: 61

MONTGOMERY, McCRACKEN, WALKER & RHOADS, LLP
(A LIMITED LIABILITY PARTNERSHIP FORMED IN PENNSYLVANIA).
BY: Paul H. Zoubek
457 HADDONFIELD ROAD, 6TH FLOOR
CHERRY HILL, NJ 08002
TELEPHONE: (856) 488-7700
FAX: (856) 488-7720
ATTORNEYS FOR DEFENDANT ROBERT STEIN

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT STEIN,

Defendant.

Case: 2:12-cr-00140

Hon. Dennis M. Cavanaugh, U.S.D.J.

**CONSENT ORDER MODIFYING DEFENDANT ROBERT STEIN'S CONDITIONS
OF RELEASE TO PERMIT HIM TO TRAVEL OUTSIDE THE
CONTINENTAL UNITED STATES**

This matter having come before the Court upon the application of Paul H. Zoubek, Esquire, counsel for Defendant Robert Stein, for an Order Modifying Defendant's Conditions of Release to Permit Defendant to Travel Outside the Continental United States; and the United States Department of Justice, Antitrust Division and Pretrial Services having no objection and consenting to the request; and Defendant being in compliance with the conditions of his release;

IT IS on this 28 day of June 2012;

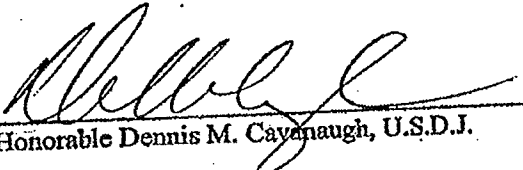
ORDERED that Defendant Robert Stein's Conditions of Release are modified to permit him to travel on vacation to Canada from on or about July 16, 2012 to on or about July 23, 2012;

Case 2:12-cr-00140-DMC Document 11 Filed 06/28/12 Page 2 of 2 PageID: 62

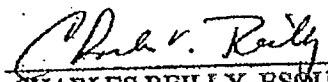
IT IS FURTHER ORDERED that Defendant provide an itinerary of his trip to his Pretrial Services officer prior to his departure; and

IT IS FURTHER ORDERED that Defendant make arrangements to return his passport to Pretrial Services within 72 hours of his return to the United States.


APPROVED AND SO ORDERED


Honorable Dennis M. Cavanaugh, U.S.D.J.

CONSENTED TO:

By: 
CHARLES REILLY, ESQUIRE
United States Department Of Justice
Antitrust Division
Jacob K. Javits Federal Building
Suite 3630
26 Federal Plaza
New York, NY 10278
Attorney for Plaintiff

Dated: June 22, 2012

By: 
PAUL H. ZOUBEK, ESQUIRE
Montgomery, McCracken, Walker
& Rhoads, LLP
LibertyView
457 Haddonfield Road, 6th Floor
Cherry Hill, NJ 08002
Attorney for Defendant

Dated: June 24, 2012